

EXHIBIT B

From: [REDACTED] minneapolismn.gov>

To: [REDACTED]@ppnecs.org>

Subject: RE: Ward 7 Newsletter 10/21/22

Date: Wed, 26 Oct 2022 18:49:03 +0000

Importance: Normal

I am in it and will give it 150% I assure you, I am seeing what you folks deal with in a super passive aggressive way now.

[REDACTED]

From: [REDACTED]@ppnecs.org>

Sent: Wednesday, October 26, 2022 10:58 AM

To: [REDACTED]minneapolismn.gov>

Subject: RE: Ward 7 Newsletter 10/21/22

Lisa - I hate to say it but this is the bureaucratic/protect my fiefdom BS that has always prevented us from moving an ordinance at either City Hall. I tire of the big talk. As I told you earlier, we've needed to do this for years – even though all we're doing is reiterating the FACE act and asking permission to paint the sidewalk – but our bandwidth is stretched and we need to maximize impact. Keep the pressure on and let me know how I can help!

[REDACTED]

From: [REDACTED]@minneapolismn.gov>

Sent: Wednesday, October 26, 2022 9:29 AM

To: [REDACTED]@ppnecs.org>

Subject: Re: Ward 7 Newsletter 10/21/22

Thank you Tim I kind of needed this little peptalk because I'm spending every day putting out little fires about this which should be such a no big deal issue I am shocked. Now I'm trying to reach out to the police chief to find out [REDACTED] I will let you know if we need to have some advocacy. Maybe it's not a bad idea for the actual public hearing let's discuss.

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From: [REDACTED]@ppnecs.org>

Sent: Wednesday, October 26, 2022 9:27 AM

To: [REDACTED]minneapolismn.gov>

Subject: RE: Ward 7 Newsletter 10/21/22

See below 😊

From: [REDACTED]@minneapolismn.gov>

Sent: Wednesday, October 26, 2022 9:24 AM

To: [REDACTED]@ppnecs.org>

Subject: Re: Ward 7 Newsletter 10/21/22

A few updates. Allison has continued to write to me demanding that the same protection be given to crisis pregnancy centers. I said to her I didn't think that there were any crisis pregnancy centers in town that had protesters outside impeding peoples access do you know anything about that? I have never heard of such a thing. Make them prove it

Second we got yet another email today from someone at MPD

Ridiculous. Say the word and we'll unleash so much pro-choice force on City Hall that they'll beg for mercy (and no one will look good)

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From: [REDACTED]@ppnccs.org>
Sent: Wednesday, October 26, 2022 9:21:42 AM
To: [REDACTED]minneapolismn.gov>
Subject: RE: Ward 7 Newsletter 10/21/22

Good morning [REDACTED] - No one knows who she is.

An update on a related matter – yesterday in a Hennepin Cty courtroom one of our escorts bravely stood up to the anti-choice protestor/bully who assaulted her with an umbrella on August 1st (I think you have the video of the assault).

Our escort was given the chance to make a victim's impact statement. The protestor/bully pled guilty to 5th degree misdemeanor assault and will be on probation for one year with many conditions, one of which is a no-contact order with our escort and a 3-block distance ban from the Lagoon clinic and BP clinic. St Paul clinic on Vandalia out of reach in Ramsey Cty.

Best,

From: [REDACTED]
Sent: Tuesday, October 25, 2022 11:44 AM
To: [REDACTED]minneapolismn.gov>
Subject: RE: Ward 7 Newsletter 10/21/22

Hi [REDACTED] – I don't know who she is. Let me see if our security department recognizes her.

From: [REDACTED]minneapolismn.gov>
Sent: Tuesday, October 25, 2022 7:53 AM
To: [REDACTED]
Subject: Fwd: Ward 7 Newsletter 10/21/22

[REDACTED],

Do you have any idea who this woman is she seems to be questioning the protection of ordinance from an anti-choice point of view but I'm not positive what's your read on it? I haven't sent her any photos or videos and I have not mentioned Planned Parenthood either.

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From: [REDACTED]
Sent: Monday, October 24, 2022 6:27 PM

To: [REDACTED] minneapolismn.gov>

Cc: [REDACTED] minneapolismn.gov>

Subject: Re: Ward 7 Newsletter 10/21/22

Actually, I was mistaken (just reread the info email from September): the attacks referenced were across the US (Birthright in St Paul was vandalized too), but not a New Life Family Services clinic. The 2 Minneapolis clinics have just had minor vandalism and/or public misinformation/libel (which the police had been notified at the time).

Were any of the videos you saw from Minneapolis (or Minnesota) clinics?

[REDACTED]

On Mon, Oct 24, 2022 at 1:35 PM [REDACTED] wrote:

Where was this and did they call 911?

[REDACTED]

From: [REDACTED]
Sent: Monday, October 24, 2022 9:52 AM
To: [REDACTED] @minneapolismn.gov>
Cc: [REDACTED] @minneapolismn.gov>
Subject: Re: Ward 7 Newsletter 10/21/22

Thank you for your response. Unfortunately, I am aware of at least one local pregnancy center receiving threats of violence, so I'm glad to hear that the ordinance would apply across the board.

Was the footage you saw happening at Minneapolis abortion providers?

[REDACTED]

On Mon, Oct 24, 2022 at 7:42 AM [REDACTED] minneapolismn.gov> wrote:

The pregnancy centers have protesters that are blocking entrances and of course the law would be applied equally but I'm not aware of problems at pregnancy centers and I've seen hours and hours of video of aggression and blocking entrance to clinics.

[REDACTED]

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From: [REDACTED]
Sent: Friday, October 21, 2022 8:02 PM
To: [REDACTED] minneapolismn.gov>
Subject: Re: Ward 7 Newsletter 10/21/22

Hello [REDACTED],

Thank you for your hard work and I hope you're doing well!

Will the security measure you mentioned below...

“...ordinance aimed at codifying a measure to provide Security to Reproductive Healthcare Clinics in Minneapolis. ...”

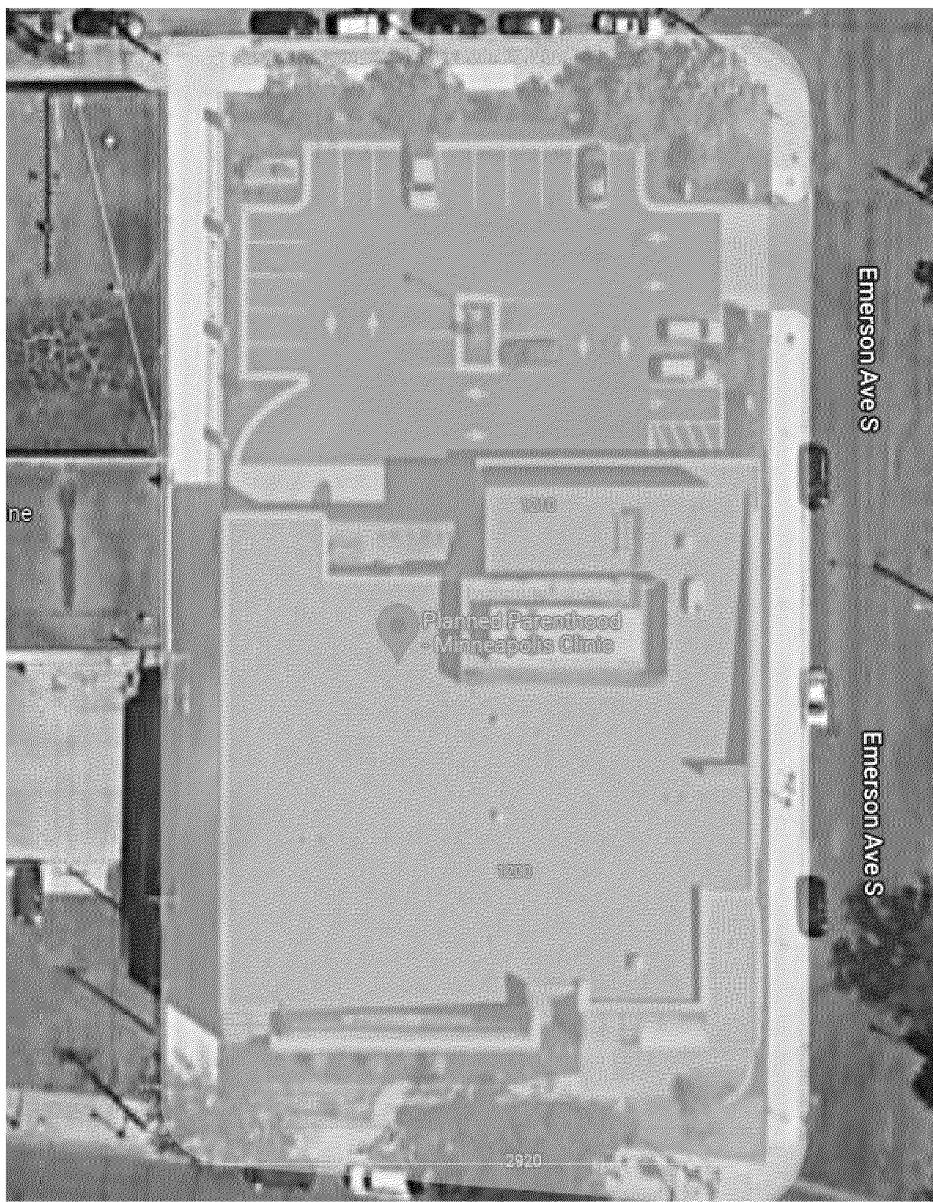
...apply to the many pregnancy centers in Minneapolis as well?

Thank you,

[REDACTED]

Planned Parenthood Uptown Enforcement Options

1200 Lagoon Avenue, Minneapolis MN, 55408



GENERAL GUIDANCE

- Encourage and protect First Amendment speech. Educate and inform protesters of the ordinance or applicable state laws. Attempt to gain compliance without enforcement.
- Use state laws whenever practicable or appropriate. If conduct is covered by a state law listed in the sections below, **MCAO preference is for enforcement action to be taken based on the state law rather than city ordinance.** Use our ordinance only in event of conduct that is a clear violation of our ordinance and is not covered by a state law.
- Progressive enforcement – warning first, then cite if probable cause is present and enforcement is necessary. **Arrest only if a Rule 6 reason applies:** Release required unless it reasonably appears (1) the person must be detained to prevent bodily injury; (2) further criminal conduct will occur; or (3) a substantial likelihood exists that the person will not respond to a citation.
- Gather video evidence from the clinic (to include time prior to enforcement action occurring).
- If the statute or ordinance requires physical obstruction, ensure the conduct does more than merely delay or annoy. There must be a physical act directed at the individual that obstructs their access. If a sidewalk is 6 feet wide a stationary protestor blocking 2 feet of said sidewalk will be insufficient to show physical obstruction absent additional actions. An example would be a protestor mirroring the individuals' movements to block access and prevent the individual from walking around the protestor.

ENFORCEMENT OPTIONS BY ZONE (reference map above)

Green Zone (Planned Parenthood private property)

- *Trespass – Minnesota Statutes Section 609.605*
 - Misdemeanor per Subdivision 1(b) – can be gross misdemeanor if two prior convictions.
 - 609.605 Subd 1(b)(3) Prohibits intentionally trespassing on Planned Parenthood property and, without claim of right, refusing to depart from the property on demand of the lawful possessor.
 - 609.605 Subd. 1(b)(8) Prohibits intentionally returning to the property of another within one year after being told to leave the property and not return, if the actor is without claim of right to the property or consent of one with authority to consent.
- *Physical Interference with Safe Access to Healthcare – Minn. Stat. 609.7495*
 - Subd. 2. Obstructing access prohibited. A person is guilty of a gross misdemeanor who intentionally and physically obstructs any individual's access to or egress from a facility.
 - Nothing in this statute shall be construed to impair the right of any individual or group to engage in speech protected by the United States Constitution, the Minnesota Constitution, or federal or state law, including but not limited to peaceful and lawful handbilling and picketing.
 - Only use this statute for truly obvious and egregious conduct (chaining self to doorways/entrances, for example)
- *Disrupting Access to Reproductive Healthcare Facilities Prohibited – City Code Section 405.20*
 - This section could technically also be applied on Planned Parenthood's private property, but Trespass should be utilized when possible per general guidance above.

Orange Zone (public driveway to planned parenthood parking lot)

- *Public Nuisance – Minn. Stat. 609.74(2)*
 - Whoever intentionally interferes with, obstructs, or renders dangerous for passage, any public highway or right-of-way is guilty of a misdemeanor.
 - The orange zone public driveway is right-of-way and would qualify if someone intentionally obstructs the driveway.
- *Prohibitions; Stopping, Parking – Minn. Stat. 169.34*
 - No person shall stop, stand, or park a vehicle except when necessary to avoid conflict with other traffic or in compliance with the directions of a police officer or traffic control device...on a sidewalk or in front of a public or private driveway.
 - Violation is a petty misdemeanor (no arrest)
- *Occupying Driveways prohibited - City Code Section 405.30*
 - Misdemeanor per City Code Section 1.30
 - This section only applies during business hours.
 - As of 11/18/22, Planned Parenthood Uptown's business hours are: Monday – Friday 10am to 8pm; Saturday – Sunday 10am to 6pm; Closed New Years Day, MLK Day, Memorial Day, July 4th, Labor Day, Thanksgiving, and Christmas Day.
 - Prohibits knowingly entering onto or creating an obstruction within the driveway.
 - Standard is knowingly. If they're in the driveway and not covered by one of the 4 exceptions, their stated purpose is irrelevant.
 - "Entering onto" covers a person on the driveway.
 - Obstruction covers the placement of objects in the driveway.
 - Four exceptions:
 - Using the driveway to go between the street and Planned Parenthood.
 - Crossing the driveway completely without slowing or stopping and continuing to a destination beyond Planned Parenthood.
 - Crossing the driveway completely (cannot step in, then back out on the same side in an attempt to disrupt).
 - Continuing to a destination beyond Planned Parenthood means no pacing back and forth in the driveway/immediate area.
 - No slowing beyond reasonable pace or stopping in middle of driveway.
 - Use by government employees, agents and assigns when acting within the scope of their duties.
 - Government workers, ROW permitted work like utilities, etc.
 - Use by Planned Parenthood employees, agents and assigns when acting within the scope of their duties.
 - This includes patients, volunteers, and contractors like snow removal.
- *Disrupting Access to Reproductive Healthcare Facilities Prohibited – City Code Section 405.20*
 - This section could technically also be applied within the driveway but other options are more on point and should be utilized if possible.

Yellow Zone (sidewalks, alley, third-party property)

- *Physical Interference with Safe Access to Healthcare – Minn. Stat. 609.7495*
 - Subd. 2. Obstructing access prohibited. A person is guilty of a gross misdemeanor who intentionally and physically obstructs any individual's access to or egress from a facility.
 - Nothing in this statute shall be construed to impair the right of any individual or group to engage in speech protected by the United States Constitution, the Minnesota Constitution, or federal or state law, including but not limited to peaceful and lawful handbilling and picketing.
 - Only use this statute for truly obvious and egregious conduct (chaining self to doorways/entrances, for example). Reference direction on physical obstruction from general guidance section above.
- *Disrupting Access to Reproductive Healthcare Facilities Prohibited – City Code Section 405.20*
 - Misdemeanor per City Code Section 1.30.
 - Prohibits knowingly physically disrupting access to, ingress to, or egress from Planned Parenthood property.
 - Standard is knowingly.
 - Includes “physically” qualifier, so speech at a distance will not count. Refer to general guidance for examples of physical obstruction.
 - Disrupt is defined as obstruct, impede, or hinder.
 - Applies in relation to another individual’s attempts to access/enter/leave the entire Planned Parenthood property, which could occur via the driveway or walkup building entrances. Planned Parenthood also has private outside space (parking lot), but it’s fenced and only accessible via the driveway.
 - Same four exceptions as 405.30:
 - Physical disruption when using the driveway to go between the street and Planned Parenthood.
 - This one is pretty obvious.
 - Physical disruption when crossing the driveway completely without slowing or stopping and continuing to a destination beyond Planned Parenthood.
 - Crossing the driveway completely, means no stepping in, then back out on the same side.
 - Continuing to a destination beyond Planned Parenthood means no pacing back and forth in the driveway/the area immediately around the driveway. If they’re going to cross, they have to go all the way to the end of the block, or it’s a violation.
 - No slowing or stopping during a cross of the driveway.
 - Physical disruption by government employees, agents and assigns when acting within the scope of their duties.
 - Government workers, ROW permitted work like utilities, etc.
 - Physical disruption by Planned Parenthood employees, agents and assigns when acting within the scope of their duties.
 - This includes patients, volunteers, and contractors like snow removal.